

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MISSOURI
3 AMIE LITTLEFIELD,)
4 Plaintiff,)
5 vs.) Cause No. 4:21-CV-304-SEP
6 AMERICAN ALTERNATIVE)
7 INSURANCE CORPORATION,)
8 Defendant.)
9
10
11
12
13

14 DEPOSITION OF Protective Order
15 TAKEN ON BEHALF OF THE DEFENDANT
16 January 27, 2022
17
18
19
20
21
22
23
24
25

1 back of an ambulance, when she was grabbing a bar and
2 the ambulance came to a stop. So she claims she was
3 injured from that, okay?

4 A. (The witness indicated.)

5 Q. So I'm giving you some background so
6 that -- my understanding is from records that we've
7 obtained from St. Luke's Hospital that that patient
8 was your husband or your late husband. So -- and
9 we're talking to you because we're trying to find any
10 witnesses to the subject incident. I have some
11 documents, which may or may not refresh your
12 recollection, such as the EMS records associated with
13 your husband's treatment that day. I'm happy to show
14 you if it's anything that you think will help. Do you
15 remember that your husband was -- your former husband
16 was taken to the hospital on November 24th of 2010,
17 ma'am?

18 A. I don't remember it, but he's been to the
19 hospital quite a few times.

20 Q. Okay.

21 A. He was sick.

22 Q. Let me do this. I will show you a
23 document, a Monarch Fire Protection District document.
24 And your husband's name was Protective Order correct?

25 A. Protective Order

1 Q. Okay. And I'm gonna show you just this
2 document, and you're free to -- some of it is
3 redactive, but you're free to look through it, and let
4 me know if that refreshes your recollection as to the
5 day.

6 A. I don't remember. I mean I called the
7 ambulance so many times.

8 Q. Sure.

9 A. But I don't remember if -- what day it was
10 that I called. It was in evenings usually, and the
11 paramedics came in, Protective Order and took him
12 to the hospital I remember.

13 Q. Okay. You said to Protective Order him to come to
14 the hospital?

15 A. Yes.

16 Q. I see. And --

17 A. They would tell me to take my time, be
18 careful, and then meet him at the hospital, which I
19 did.

20 Q. I -- I -- for the record, again, one of the
21 records that we have is that 20 -- or 2,000 -- 20:00,
22 so it would be 8:00 p.m. in the evening. That's what
23 we have to go on with respect to the time of day.
24 Does that -- and, again, it being wintertime, 11/24,
25 does that help refresh your recollection as to whether

1 you were, you know, going to the hospital at that time
2 or with your -- or near your husband at that time?

3 A. If I called the ambulance it was the
4 evening. Most of the time -- and they would like I
5 said, come to the hosp- -- house, Protective Order him, get
6 him ready, put him in an ambulance, and they would
7 leave. And I'd be home getting his stuff ready, like
8 his driver's license, his medical, and get to the
9 hospital.

10 Q. Given all of what we've discussed and given
11 the document that I've asked for your review with
12 respect to the Monarch Fire Protection District
13 redactive EMS records, do you recall whether you saw
14 or followed the ambulance on November 24th of 2010
15 into St. Luke's underground tunnel?

16 A. No, I never followed the ambulance.

17 Q. Okay.

18 A. By the time I got there, the ambulance was
19 already at the emergency room entrance. The ambulance
20 was already emptied, and they had taken him to his
21 room, ER room.

22 Q. Okay. Did you -- did you ever see the
23 ambulance being operated in that case?

24 A. No.

25 Q. Very good. All right. Then was your

1 husband -- did he ever speak to you after that date
2 about any kind of a stop that occurred from the
3 ambulance or any kind of an incident?

4 A. No, sir.

5 Q. Okay. Was your husband -- was he lucid at
6 that point where you could have a conversation with
7 him about maybe something that could have taken place
8 inside the ambulance?

9 A. Yes.

10 Q. Okay. And I'm sorry for your loss. What
11 was the day that your husband passed?

12 A. February 29th, 2013. So this time, nine
13 years ago, he was in the hospital dying.

14 Q. Again, ma'am, I'm sorry for that. The last
15 thing I have is -- I think I already asked it. Did he
16 ever mention that he observed or knew about any
17 paramedic that was injured in the line of work while
18 treating him?

19 A. No. He would have said something.

20 Q. Okay. I am going to hand you an exhibit
21 that was marked today, Exhibit C, and I'll just
22 represent to you that that's an overhead of St. Luke's
23 Hospital, correct?

24 A. (The witness indicated.)

25 Q. And that's a, yes, for the record?

1 we were just off the record we noted that
2 February 29th of 2013 is a leap year, and maybe Ms.
3 Seals made a mistake. And, Protective Order, what -- did you
4 in fact make an error?

5 A. I did make an error.

6 Q. Okay. And go ahead and please correct that
7 for us.

8 A. It's February 28th, 2013.

9 Q. And that's the date that your husband has
10 passed?

11 A. When he passed away.

12 Q. And that's the individuals in the back of
13 the ambulance?

14 A. Yes, sir.

15 MR. PLUNKERT: Okay. Well, thank you for
16 coming back in.

17 THE WITNESS: Thank you.

18 (Whereupon, the deposition concluded at 6:03 p.m.)
19
20
21
22
23
24
25